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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Civil Action No. 1:07-cv-356-JM

THE FREEDOM FROM RELIGION FOUNDATION;
JAN DOE AND PAT DOE, PARENTS; DOECHILD-1, DOECHILD-2 and
DOECHILD-3, MINOR CHILDREN;

Plaintiffs,

v.

THE CONGRESS OF THE UNITED STATES OF AMERICA;
THE UNITED STATES OF AMERICA;
THE HANOVER SCHOOL DISTRICT ("HSD");
THE DRESDEN SCHOOL DISTRICT ("DSD");
SCHOOL ADMINISTRATIVE UNIT 70 ("SAU #70");

Defendants.

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Pursuant to case law¹ and Rule 26(a)(1)² of the Federal Rules of Civil Procedure, Plaintiffs move to have the Court enter a protective order that protects the true identity of the Plaintiffs (other than the Freedom From Religion Foundation (“FFRF”)). Submitted herewith in support of this Motion is a stipulated Protective Order agreed to by counsel for each party, and a Memorandum in support of this Motion.

Respectfully submitted,

/s/ - Michael Newdow

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January 22, 2008

¹ *Doe v. Porter*, 370 F.3d 558 (6th Cir. 2004); *Doe v. Stegall*, 653 F.2d 180 (5th Cir. 1981).

² Fed. R. Civ. P. Rule 26(a)(1)(A) states that disclosures must be made “[e]xcept as ... ordered by the court.”

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CERTIFICATE OF SERVICE

Civil Action No. 1:07-cv-356-JM

Freedom From Religion Foundation v. U.S. Congress

I HEREBY CERTIFY that a true and correct copies of

- (1) PLAINTIFFS' MOTION FOR PROTECTIVE ORDER
- (2) STIPULATED PROTECTIVE ORDER
- (3) MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PROTECTIVE ORDER
- (4) EXHIBITS (A)-(E) ACCOMPANYING MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

were provided by electronic service to the Clerk of the Court via CM/ECF on this 22nd day of January, 2008, causing these items to be served on:

United States Defendants: eric.beckenhauer@usdoj.gov
theodore.hirt@usdoj.gov

School District Defendants: dbradley@stebbinsbradley.com

State of New Hampshire: Nancy.Smith@doj.nh.gov

January 22, 2008

/s/ Michael Newdow

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